

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CBIZ, INC., <i>et al.</i> ,)	CASE NO. 1:24-cv-01027-JPC
)	
Plaintiffs,)	JUDGE J. PHILIP CALABRESE
)	
v.)	MAGISTRATE JUDGE JONATHAN D.
)	GREENBERG
GREGORY J. CRYAN, <i>et al.</i> ,)	
)	PLAINTIFFS' MOTION FOR SUMMARY
Defendants.)	JUDGMENT AS TO DEFENDANTS'
)	COUNTERCLAIM/THIRD-PARTY
)	COMPLAINT AND CONSOLIDATED
)	CLAIMS ORIGINALLY FILED IN
)	GEORGIA STATE COURT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs CBIZ, Inc., CBIZ Insurance Services, Inc., and Third-Party Defendant Mike Gill (collectively "CBIZ") respectfully move the Court to grant CBIZ summary judgment on all claims raised in Defendants' Counterclaim/Third-Party Complaint and all claims raised by Defendants' Consolidated Complaint (See ECF No. 11-1 in Case No. 1:24-cv-1350) because there are no genuine issues of material fact and CBIZ is entitled to judgment as a matter of law. The reasons supporting this motion are set forth in the attached Memorandum of Law.

Respectfully submitted,

/s/ Lawrence D. Pollack

Jeffrey S. Dunlap (0067923)

Lawrence D. Pollack (0042477)

Ashtyn N. Saltz (0089548)

Ryan W. Gillespie (0102606)

UB GREENSFELDER LLP

Skylight Office Tower

1660 West 2nd Street, Suite 1100

Cleveland, Ohio 44113-1448

(216) 583-7000

(216) 583-7001 (Fax)

jdunlap@ubglaw.com

lpollack@ubglaw.com

asaltz@ubglaw.com

rgillespie@ubglaw.com

Attorneys for Plaintiffs CBIZ, Inc., CBIZ Benefits & Insurance Services, Inc., CBIZ Insurance Services, Inc., and Third-Party Defendant Mike Gill

CERTIFICATE OF SERVICE

I certify that on April 7, 2025, a copy of *Plaintiffs' Motion for Summary Judgment as to Defendants' Counterclaim/Third-Party Complaint and Consolidated Claims Originally Filed in Georgia State Court* was electronically filed via the Court's CM/ECF system. Notice and a copy of this filing will be sent to counsel of record for all parties via the Court's CM/ECF system.

/s/ Lawrence D. Pollack
*One of the attorneys for Plaintiffs CBIZ, Inc.,
CBIZ Benefits & Insurance Services, Inc., and
CBIZ Insurance Services, Inc., and Third-
Party Defendant Mike Gill.*